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KGW TV8

1501 S.W. Jefferson Street
Portland, Oregon 97201
503/226-5000
A Division of King Broadcasting Company



94-103

September 30, 1994

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OCT 15 1994

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

POLICY & RULES DIVISION

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Dear Chairman Hundt:

FCC MAIL ROOM

I am writing to urge the Commission to proceed expeditiously with a Notice of Proposed Rulemaking directed toward elimination of the "off-network" restriction of the Prime Time Access Rule.

As the President and General Manager of KGW-TV, an NBC affiliate in Portland, Oregon, I support repeal of the "off-network" restriction. Due to this restriction, I am forced to pay excessive license fees for programming that, for the most part, neither I, nor our viewers, want on my station. At the same time, the independent station and the FOX affiliated station are able to obtain higher quality, proven programming at a lessor cost. With the current diversity of programming options for viewers, why is my station not allowed to compete fairly in an open marketplace?

The Commission has received numerous pleadings which fully address this issue. To delay this necessary reform by issuing a Notice of Inquiry will only prolong my station's disadvantage in the marketplace. I urge the Commission to proceed with a Notice of Proposed Rulemaking and act to eliminate this outdated restriction. Thank you for your consideration of my views.

Very Truly Yours,

Dennis A. Williamson
President & General Manager

Via Facsimile and U.S. Mail

cc: Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Susan Ness
Commissioner Rachelle B. Chong
Office of the Secretary

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OCT 13 1994

POLICY & RULES DIVISION

1001 WOOD RIDGE CENTER DRIVE
CHARLOTTE, NC 28217-1901
(704) 329-3636

October 4, 1994

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Dear Chairman Hundt:

I am writing to urge the Commission to proceed expeditiously with a Notice of Proposed Rulemaking directed at the elimination of the "off-network" restriction of the Prime Time Access Rule.

I have worked in the advertising and the broadcast industry for over 30 years. I have held various management positions at television stations in markets ranging from top 10 to 130+. When "PTAR" was first put into law I was working at a major advertising agency and part of my responsibility was obtaining clearances for first run programming produced and sponsored fully by a major automotive manufacturer. I do not believe that the Prime Time Access Rule has ever achieved its intent. I believe it impedes rather than fosters competition. I also believe that the prohibition artificially inflates the prices affiliated stations are forced to pay for programming and creates an economic windfall for a few producers and distributors.

The Commission has received numerous pleadings which fully address this issue. A Notice of Inquiry is not necessary and will only delay the implementation of this needed reform. As we all know, the television marketplace is changing rapidly. I would hope that you will proceed with a Notice of Proposed Rulemaking and that the Commission will act to eliminate this outdated restriction.

Thank you for considering my views.

Sincerely,


John M. Llewellyn
President and General Manager

JML:dm

Via facsimile and U.S. Mail

cc: Commissioner James H. Quello
Commissioner Andrew C. Barrett
Commissioner Susan Ness
Commissioner Rachelle B. Chong
Office of the Secretary

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October 5, 1994

POLICY & RULES DIVISION

Chairman Reed Hundt
Federal Communications Commission
1919 M Street, N.W. Room 814
Washington, D.C. 20554

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Dear Chairman Hundt:

FCC MAIL ROOM

May I strongly urge you to retain the off-network portion of the prime-time access rule.

As far as WTMV, in the Tampa Bay area, licensed to Lakeland, Florida is concerned, it is vital. The off-network rule has promoted diversity and competition in this television market. In the past, this portion of the prime-time access rule has been instrumental in creating a competitive, independent, atmosphere here. It has also been responsible for creating new off-air television networks.

Independent stations such as ours already have a difficult time securing the rights to top quality programming. Without the off-network rule, it will be nearly impossible for us to do so. Our total annual revenue is no more than 1/20th of the top station in the market. Without this tool it will be impossible for us to acquire good programs. Without PTAR and the off-network portion of the rule, the Tampa Bay area will receive its programming from a few telecommunications giants and our station could likely go dark for lack of revenue and ratings due to decreased program availability.

Please do not proceed directly to rule making in this matter. There are far too many unresolved and complex issues which have not been discussed on the record.

On the left hand, satellite delivered cable networks are taking programs from my station left and right. Elimination of the off-network portion of PTAR will cause the major networks to take the rest to the local affiliate on the right hand. We will be in the position of being forced to carry nothing better than home shopping or other highly specialized program formats provided by a self-serving giant of another sort.

Stations such as WTMV deserve a chance to compete. I urge you to proceed with caution and retain the off-network rule.

Sincerely,

Dan L. Johnson
General Manager

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October 6, 1994

Douglas L. Armstrong
President and
General Manager

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

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OCT 11 1994

150-B Puuhale Road
Honolulu, HI 96819-2282
Phone 808 847.3246
Facsimile 808 845.3616

Dear Chairman Hundt,

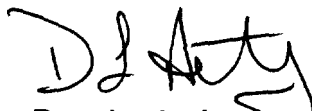
FCC MAIL ROOM

I am writing to urge the Commission to proceed expeditiously with a Notice of Proposed Rulemaking directed at elimination of the "off-network" restriction of the Prime Time Access Rule.

As a television station, we support repeal of the "off-network" restriction. In today's video marketplace, this restriction is anachronistic. It impedes rather than fosters competition and, thus, diversity. The prohibition artificially inflates the prices affiliated stations are forced to pay for programming and creates a subsidy for large producers and major-market independent station.

The Commission has received numerous pleadings which fully address this issue. A Notice of Inquiry is not necessary and will only delay the implementation of this modest, needed reform. Given the rapid pace of change in the television marketplace, I hope that you will proceed with a Notice of Proposed Rulemaking and that the Commission will act to eliminate this outdated restriction. Thank you for your consideration of our views.

Sincerely,



Douglas L. Armstrong
President & General Manager

DLA:mwr

cc: Commissioner's J. Quello, A. Barrett, S. Ness, R. Chong, Office of the Secretary
Michael Isaacs, Providence Journal Broadcasting

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